22 July 2021 5899

Mr Andy Nixey NSW Planning, Industry & Environment GPO Box 39 Sydney NSW 2001

Dear Mr Nixey,

Re: Modification to a Part 3A Concept Approval ('S75W') at 14-22 Wentworth Street & 19-21 South Steyne, Manly ('the Property')

We write on behalf of our Client, Royal Far West ('RFW') and further to the NSW Government Architect's project correspondence dated 11th May 2021. Our consideration of issues raised in this letter is provided below.

1. Masterplan - Activation

The design as reflected in the amended Section 75W ('S75W") modification application (Issue B, dated July 2021) sees a significant increase in both street activation as well as activation of the main public courtyard space when compared to the earlier S75W design. Key aspects of this amended design with respect to ground floor activation include:

- The establishing of a direct and on grade pedestrian linkage under Building D from South Steyne into the main courtyard space. The earlier proposed raised and mounded planting areas along the South Steyne frontage has been removed, replaced with low, hardy coastal planting carefully interspersed into the ground level stone feature paving.
- 8 active addresses to South Steyne where previously there was only 1 (when compared with the earlier version of this S75W). These addresses include 6 new retail tenancies, 2 residential lobbies and a large commercial tenancy. The 6 retail tenancies and 2 residential lobbies also address the public courtyard space behind, ensuring a strong visual surveillance of both these areas.
- An increase to the under-croft soffit height to Building D (the building facing South Steyne). This will allow for a greater level of visual connection through the development as well as providing greater visibility of the sculptural soffit proposed for this building (made more impactful through a future careful consideration of artificial lighting).
- The earlier proposed continuous carpark ventilation grille along the South Steyne has been removed.
- A secure perimeter line has been included on the ground floor to enable the courtyard space to be secured after hours. This secure line includes a number of elements such as retail tenancies, frameless pivot gates and landscape treatments such that this perimeter can be integrated into the project's architectural design and positively contribute to the adjacent streetscape.

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Figure 1: Diagram of proposed perimeter security line (in a dashed green line) for the ground floor level.

2. Masterplan - Drummond House.

As part of this S75W application, both a project Heritage Impact Statement and an amended Heritage Conservation Management Plan for the site has been prepared. Included in these documents is a detailed discussion of this proposal and how it contributes to the maintenance of heritage values on the site.

Also included into this application is a study of the current levels of residential amenity afforded to the clients of Royal Far West ('RFW') in the residential accommodation housed in the rear portions of Drummond House (drawing sheet S75W-1853 Issue B). As evident in this study, RFW's client accommodation achieves relatively low levels of visual and acoustic privacy, low levels of environmental performance (thermal comfort, daylighting etc.) as well as being deficient in a number of operational criteria (leading to amongst other issues, inadequate supervision and budget impacts due to increased levels of staffing). As discussed in the application's Heritage Impact Statement, an important part of the significance of Drummond House lay in its continued relevance and use by RFW. This application ensures that Drummond House will remain relevant to RFW by achieving high standards of client/patient accommodation whilst also maintaining the culturally and historically significant elements of Drummond House.

3. Masterplan - Street Setbacks

With respect to building street setbacks, the revised S75W application has been amended to now include a setback to Wentworth Street which is closely aligned to the Part 3A Concept Plan's Wentworth St setback.

With respect to apparent building bulk and scale, these proposed amendments when considered as part of the overall S75W application achieve an acceptable development outcome for the following reasons:

- The profiled form to the building adjacent to Drummond House allows for a clear and holistic reading of the significant parts of Drummond House.
- Achieves a reasonable balance between the protection of private views and the protection of public domain views. Refer to the accompanying Visual Impact Assessment for an examination of both public and private visual impacts.
- The proposed S75W building arrangement allows for a number of enhancements over the earlier approved Part 3A Concept Plan. Some of these enhancements include: a new public forecourt space with generous amounts of tree planting, a significantly increased level of ground plane openness both into the development and across to the Manly foreshore, good levels of street and courtyard activation, high levels of residential amenity, and the provision of high-quality accommodation for the continued growth of Royal Far West's charitable mission.

4. Masterplan - Shadow Studies

As part of this S75W application, a number of shadow and solar access studies have been prepared. These studies examine both shadows created by the S75W proposal as well as those of the approved Part 3A Concept Plan. Also included in this application is a study of solar access to the neighbouring residential apartment development at No. 25-29 Victoria Parade. This study notes that the solar access impacts of the S75W proposal complies with the guidelines detailed in the NSW Residential Apartment Guide (Objective 3B-2 Design guidance).

The overshadowing studies prepared for the S75W application have been reviewed and certified by a third-party specialist architectural visualisation consultant, Deneb Design.

5. Masterplan - Wind.

Included in this S75W application is a wind impact statement prepared by Arup. This statement examines the general overall wind effects of the proposed S75W application as well as providing guidance for the subsequent detailed design development.

6. Architecture and landscape.

This S75W proposal significantly increases the amount of available planting zones when compared with the approved Part 3A Concept Plan. Further these planting areas are well distributed throughout the design being both in the public and more private domains. A number of these landscape areas have been designed to include soil depths (900mm) to allow for medium to large tree planting e.g. *Angophora costata*. We note that the approved Part 3A Concept Plan did not include any deep soil planting zones (or areas for tree planting) and that the softworks areas nominated (especially on the ground plane) are significantly less that the S75W proposal. Please refer to the project's landscape architect's design statement for more details on the project's landscape design.

Included in this Section 75W application is an arboricultural report which examines the possible impacts on the adjacent street tree planting from the proposed development. This report recommends the management requirements for work near these trees to minimise potential for impact.

We also note that this revised Section 75W application now includes increased building setback to Wentworth St, closely aligning itself to the approved Part 3A Concept Plan's footprint (both above and below ground). These increased setbacks will allow for more canopy clearance around these street trees.

Other aspects of this amended S75W proposal include:

- A provision for adaptability and growth for Royal Far West. Building C's design sees this building being able to interface with the street (to the north) and also to Royal Far West's facilities in the west. This dual aspect characteristic enables this building's 3 commercial levels to easily be re-adapted to service Royal Far West whilst still maintaining separation from the building's other user groups. These three commercial levels represent over 3,000 sqm of available floor space.
- The design of the ground floor's central multi-function space sees it form a node in the campus both interfacing to Royal Far West's facilities in the west as well as addressing the public via the courtyard (in the east) and commercial building lobby (access via Wentworth St in the north). This dual aspect characteristic will see this space being able to cater to a number of different user groups (both RFW and more public groups) without the access issues usually associated with such spaces i.e. each user controls their own access. In addition, the eastern and western facades to this space are able to be configured (by each user group) to enable the user to either completely separate themselves from the space adjacent, achieve a more filtered connection, or completely connect as would be seen on more public event days.

7. Response to Country.

Included in this S75W application is a submission detailing our Client's long and deep connection with both the area's Traditional Owners and first nations more generally. As part of this submission, a number of areas in the project have been identified for the incorporation of an integrated response to Country and place.



Figure 2. An illustration of potential areas for the project to incorporate (and embed) a respond to the traditional owners and first peoples.

8. Wayfinding

As part of our next presentation to the State Design Review Panel, a discussion of ground plane wayfinding is proposed. We note that the project has a clear articulation of use which moves from west to east. The west sees all the RFW activities entered from the address which is in between Buildings A & B. These two building will present as the face of Royal Far West to the street. Building C's commercial levels are accessed via a commercial lobby addressing Wentworth St. This street end façade to Building C can be detailed in such a way that it can clearly identify as the entry to the commercial portions of this building. The private residential (apartments) portions of the development are able to be accessed through private lobbies directly opening onto the main courtyard space. Residential lobbies to Building D are also able to be accessed directly from South Steyne.

We trust that this letter and the accompanying S75W application addresses issues identified earlier and should you require any additional information or wish to discuss these issues further, please don't hesitate to contact the undersigned.

Yours faithfully, MURCUTT CANDALEPAS PTY LTD

Evan Pearson Architect